

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

IN RE: EDWARD & CHRISTINA BUSHEE  
31 BUELL AVE  
BALLSTON LAKE, NY

TRUSTEE'S NOTICE OF  
OBJECTION TO PROPOSED  
MODIFICATION

12019

CASE NO: 10-11755

Please take notice that the undersigned Trustee hereby objects to the proposed modification for the following reason(s):

X

(1) The proposed modification does not meet the requirements of 11 U.S.C. 1325, in that:

X

A) Modification has not been proposed in good faith.  
 B) Modification does not satisfy the liquidation test.  
 C) Modification proposes a lump sum payment without evidence of source of payment.

D) Modification proposes completion of the plan in less than 36 months without 100% payment to all creditors.

X

E) Amended Schedules I & J are required to verify that all of the debtors disposable income will be funded into the plan.

(2) Insufficient information is provided for the basis of the modification.

(3) The proposed modification does not comply with 11 U.S.C. 1329(c). (The modified plan is not feasible.)

(4) The proposed modification does not comply with 11 U.S.C. 1325(b).

X

(5) Other: TRUSTEE REQUESTS 2010 TAX RETURN AND CURRENT SCHEDULES I AND J TO DEMONSTRATE GOOD FAITH OF REDUCED PAYMENT AMOUNT

May 10, 2011

/s/ Andrea E. Celli

Dated: \_\_\_\_\_

\_\_\_\_\_  
Andrea E. Celli, Trustee  
7 Southwoods Boulevard  
Albany, NY 12211

CERTIFICATE OF MAILING

The undersigned hereby certifies that a copy of this objection was mailed this date to the parties noted below:

May 10, 2011

/s/ Sandra Spring

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

Debtor(s): Above

Attorney: BRANDI BURNS

LAW OFC OF MICHAEL W. SCHAEFER  
229 WASHINGTON STREET

SARATOGA SPRINGS, NY  
(by Electronic Service)